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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
HELENA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTIN EDWARD REAP,
Defendant.

Case No. CR 16-07-H-SEH

DEFENDANT REAP'S
UNOPPOSED MOTION TO
CHANGE PLEA FROM NOT
GUILTY TO GUILTY;
MOTION TO VACATE
JUNE 28, 2016 TRIAL DATE

COMES NOW defendant Martin Edward Reap (Reap), by and through his undersigned counsel, and respectfully advises that he has reached a plea agreement with the United States. The agreement involving defendant's intention to plead guilty to Count V of the Indictment which charges the crime of accepting bribes in violation of 18 U.S.C. §666(a)(1)(B) has been signed by the defendant, his counsel and government counsel and has been filed with the Court. The plea agreement need not be filed under seal.

Based on the foregoing notice of intention, defense counsel requests that the Court set down a convenient time for change of plea and vacate the trial set for June 28, 2016.

RESPECTFULLY SUBMITTED June 13, 2016.

/s/ Michael Donahoe
MICHAEL DONAHOE
Senior Litigator
Federal Defenders of Montana
Counsel for Defendant

CERTIFICATE OF SERVICE
L.R. 5.2(b)

I hereby certify that on June 13, 2016, a copy of the foregoing document was served on the following persons by the following means:

1 CM-ECF

 Mail

1. CLERK, UNITED STATES DISTRICT COURT

1 Joseph Thaggard
Jeffrey K. Starnes
Assistant United States Attorneys
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Counsel for the United States

/s/ Michael Donahoe
MICHAEL DONAHOE
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